

April 27, 2022

**DISCOVERY MATTER**

**BY ECF**

Honorable Robert M. Illman  
United States District Court  
Northern District of California  
Eureka-McKinleyville Courthouse  
3140 Boeing Ave  
McKinleyville, CA 95519

Re: *In re Ripple Labs Inc. Litigation*, Case No. 4:18-cv-06753-PJH

Dear Judge Illman:

Pursuant to the Court's April 26, 2022 hearing and related minute entry (Dkt. 165), the parties jointly submit the following proposed order text:

Defendants are required to produce all documents and written discovery produced in the *Securities and Exchange Commission v. Ripple Labs Inc., et al.*, Case No. 1:20-cv-1083-AT-SN (S.D.N.Y.) action, including: (a) all documents produced by any party or third party, (b) all discovery responses, (c) all deposition transcripts, and (d) all expert reports produced by any party, pursuant to the following schedule: Within seven (7) days of the issuance of this order, Plaintiff must provide notice to all third parties who have not consented to production pursuant to section 9 of the protective order in this action and paragraph 23 of the protective order in the *SEC Action*, along with a copy of this order. Any third party who does not consent to production must notify both Plaintiff and Defendants of their intent to object within fourteen (14) days of receipt of such notice, and must file any motion for relief from this Court within twenty-one (21) days of receipt of such notice. Prior to the filing of any request for relief from this Court, the moving third party must meet and confer with Plaintiff in good faith. With respect to documents of third parties who do not provide notice of intent to object, Defendants shall produce such documents within thirty (30) days of this Order. With respect to documents of third parties who provide notice of their intent to object, Defendants shall produce such documents within fourteen (14) days upon resolution of the objection (including the failure of a third party to file a motion for a protective order), by agreement of the parties, or further Order from this Court or by a different date agreed to by the Parties.

A proposed order is filed with this letter as Exhibit A.

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Dated: April 27, 2022

/s/ Nicholas N. Spear

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatory.

DATED: April 27, 2021

/s/ Nicholas N. Spear  
Nicholas N. Spear

**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2022, I electronically filed the foregoing document with the clerk of the Court and served counsel of record via the CM/ECF system.

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